

Exhibit C



Reply to the Attention of	Brett Harrison
Direct Line	416.865.7932
Direct Fax	647.722.6756
Email Address	brett.harrison@mcmillan.ca
Our File No.	202043
Date	April 11, 2011

E-MAIL AND DELIVERED

Mr. Jean Boulais
Access to Information and Privacy Coordinator
Atomic Energy of Canada Limited
Place de Ville, Tower B
112 Kent Street, Suite 501
Ottawa, ON K1A 0S4
E-mail: boulaisj@aecl.ca

Dear Mr. Boulais:

Re: Access to Information Request

We act as Canadian counsel for Lantheus Medical Imaging, Inc. ("Lantheus"). Lantheus recently filed a lawsuit in the United States against its insurance company, Zurich American Insurance Company ("Zurich"), seeking payment of losses that it sustained as a result of the shutdown of the Chalk River National Research Universal ("NRU") reactor in May 2009. Please find attached a formal Access to Information Request Form, whereby Lantheus requests that Atomic Energy Canada Limited ("AECL") provide it with documents and information related to this matter, identified in Exhibit 1.

Lantheus is mindful of the time involved in responding to a request for documents of this nature, and has attempted to make its requests as narrow as is reasonably possible in the circumstances. Given the schedule for discovery in this proceeding, we would appreciate a response as soon as possible.

Yours truly,

Brett Harrison

EXHIBIT 1

The term “documents” as used below includes reports, memoranda, data or analysis of data.

1. The documents that AECL relied upon in reaching the conclusions identified below in its presentations (and any associated written testimony or reports) to the Canadian Nuclear Safety Commission (“CNSC”) of January 20, 2011 and July 5, 2010:

(a) January 20, 2011 presentation: conclusions regarding (i) root causes of the NRU reactor vessel leak at the J-41 area of the J-Ring Annulus (“Annulus”), (ii) maintenance of the carbon dioxide concentration and improvements to the carbon dioxide distribution system in the Annulus, (iii) operational performance issues that contributed to or caused the leak, (iv) the drain system in the Annulus, and (v) defective fuel issues.

(b) July 5, 2010 presentation: conclusions regarding (i) causes of the heavy water leak in the NRU reactor, including localized cavities discovered at the J-41 and J-13 to 18 areas of the Annulus, (ii) damage and other effects of the heavy water leak to the NRU reactor, including emissions of tritium above weekly action levels from May until July 2009, and (iii) the statement on page 66 of the hearing transcript that “corrosion ha[d] been progressing” at the time of the license renewal in 2007.

2. The documents that AECL relied upon in reaching conclusions regarding the cause of the leak in the NRU reactor, the damage mechanism or the condition assessment of the NRU reactor, as set forth in the following presentations (and any associated written testimony or reports):

(a) the presentation to the House of Commons Standing Committee on Natural Resources meeting on October 19, 2009;

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- (b) the presentation to the CNSC on August 27, 2009;
- (c) the presentation to the House of Commons Standing Committee on Natural Resources on August 21, 2009;
- (d) the presentation to the CNSC on July 8, 2009;
- (e) the presentation to the CNSC on June 11, 2009; and
- (f) the presentation to the House of Commons Standing Committee on Natural Resources on June 4, 2009.

3. The documents which AECL considered or reviewed in evaluating whether or not radiation caused or contributed to an alteration of the micro-structure of the aluminum alloy composing the NRU reactor vessel, and whether any such alteration caused or contributed to the May 2009 shutdown of the NRU reactor.

4. The documents which AECL considered or reviewed in evaluating the cause or causes of the nitric acid formation in the Annulus of the NRU reactor.

5. The documents which AECL considered or reviewed in evaluating the nitric acid concentration in the Annulus of the NRU reactor at the time of or during the period prior to the May 2009 NRU reactor shutdown.

6. The documents which AECL considered or reviewed in evaluating carbon dioxide flow rates in the Annulus, variations of such flow rates over time, and air leakage into the Annulus during the period prior to the May 2009 NRU reactor shutdown.

7. The documents which AECL considered or reviewed in designing or implementing a more effective carbon dioxide distribution system in the Annulus and preventing air leaks into the Annulus after May 2009.

8. The documents which AECL considered or reviewed in evaluating whether or not inadequate water drainage in the Annulus of the NRU reactor during the period prior to the May 2009 NRU reactor shutdown caused or contributed to that shutdown.

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9. Documents reporting on the results of inspections and scans of the NRU reactor vessel conducted in 2004, 2005, 2009, 2010 and 2011.

10. The results of any coupon tests, that is, tests regarding the damage mechanism, of the NRU reactor vessel following the May 2009 NRU reactor shutdown.

11. Documents graphically or numerically depicting the specific locations of the damage to the NRU reactor vessel (including “pitting,” leak holes, “dish shaped” irregularities, and thinning of the reactor vessel wall) at the time of the shutdown.

12. Documents describing damage to the NRU reactor that could be or were caused by a heavy water leak.

13. The documents which AECL considered or reviewed in evaluating whether or not defective fuel had any role in causing or contributing to the May 2009 shutdown of the NRU reactor.

14. The documents which AECL considered or reviewed in evaluating whether or not any chemicals, dessicants, or “impurities” were introduced into or found in the Annulus or in water in the Annulus space at the time of or during the period prior to the May 2009 NRU reactor shutdown.

15. The manuals, guidelines or written procedures, or the portions of such manuals, guidelines or written procedures, applicable to the maintenance and inspection of the NRU reactor in force in May 2009.

16. Documents sufficient to identify any litigation, mediation, arbitration, settlement, or other legal disputes or claims in which AECL is involved arising out of the May 2009 shutdown of the NRU reactor.

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17. Documents sufficient to identify any claim for insurance coverage made by AECL as a result of the May 2009 reactor shutdown, including the resolution of any such claim.

18. Documents sufficient to identify the persons or entities involved in maintenance of the NRU reactor, including any third party companies or consultants, prior to the May 2009 shutdown of the NRU reactor.

19. Documents sufficient to identify the two experts who reviewed AECL's interim "corrosion" assessment and any reports or other documents reflecting the expert's opinions regarding the interim "corrosion" assessment.

20. Photographs, drawings, or other images depicting the damage to the NRU reactor vessel (including "pitting" or leak holes) at or around the time of the shutdown.

21. Reports analyzing or addressing the cause(s) of the May 2009 shutdown authored, in whole or in part by any of the following persons: I. Muir, T.A. Moir, C. Bromley, G. Arsenault, K. Sedman, L. Lupton, G. Mark and C.W. Turner.

Info Source

Access to Information Request Form

Protected when completed

For official use only

Access to Information Act

Step 1

Determine which federal government institution is most likely to have the information you are seeking. Decide whether you wish to submit an informal request for the information or a formal request under the *Access to Information Act*. If you wish to make an informal request, contact the appropriate institution. The address can likely be found in *Info Source* publications which are available across Canada, generally in major public and academic libraries, constituency offices of federal Members of Parliament and most federal government public enquiry and service offices.

Step 2

To apply for information under the *Access to Information Act*, complete this form or a written request mentioning the Act. Describe the information being sought and provide any relevant details necessary to help the institution find it. If you require assistance, refer to *Info Source (Sources of Federal Government Information)* for a description of program records held by the institution or contact its Access to Information Coordinator.

Step 3

Forward the access request to the Coordinator of the institution holding the information. The address is listed in the "Introduction" to *Info Source*. Enclose a \$5.00 money-order or cheque payable to the Receiver General of Canada. Depending upon the type or amount of information being sought, you may be asked to authorize further charges.

Step 4

When you receive an answer to your request, review the information to determine whether you wish to make a further request under the Act. You also have the right to complain to the Access to Information Commissioner should you believe that you have been denied any of your rights under the Act.

Federal Government Institution

Atomic Energy of Canada Limited

Provide details regarding the information being sought
Please see Exhibit 1.

Method of access preferred



Receive copies of originals



Examine originals in government offices

Name of applicant

Brett Harrison on behalf of Lantheus Medical Imaging, Inc.

Street, address, apartment

Brookfield Place, 181 Bay Street, Suite 4400

City or town

Toronto

Province

ON

Postal Code

M5J 2T3

Telephone number

416.865.7932

This request for access to information under the *Access to Information Act* is being made by



a Canadian citizen, permanent resident or another individual present in Canada, or



a corporation present in Canada

Signature

Date

April 1, 2011

The personal information provided on this form is protected under the provisions of the *Access to Information Act* and the *Privacy Act*.

